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9 Attorneys for Creditor Bank of America, N.A.,
successor by merger to LaSalle Bank National
10 Association, as trustee for the registered
holders of GMAC Commercial MORTGAGE
11 Securities, Inc., Commercial MORTGAGE
Pass-Through Certificates, Series 2003-C1,
12 acting by and through CWC Capital Asset
Management LLC, Special Servicer
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14 **UNITED STATES BANKRUPTCY COURT**

15 **DISTRICT OF NEVADA**

16 In re:

17 HORIZON RIDGE MEDICAL &
18 CORPORATE CENTER, LLC,

19 Debtor.

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Case No. BK-S-12-13906-lbr

Chapter 11

DATE: February 6, 2014

TIME: 11:00 a.m.

20 **NOTICE OF HEARING ON BANK OF AMERICA, N.A., AS TRUSTEE'S**
21 **(I) SECOND MOTION TO SUPPLEMENT ITS CLAIM AND (II) MOTION**
22 **FOR ORDERS (A) APPROVING SALE PROCEDURES, (B) APPROVING**
RETENTION OF THE BROKER, (C) SETTING A SALE HEARING DATE,
AND (D) APPROVING THE SALE OF THE DEBTOR'S ASSETS

23 PLEASE TAKE NOTICE that Bank of America, N.A., as Trustee's ("*Lender*") (I) Second
24 Motion to Supplement Its Claim (the "*Claim Motion*") and (II) Motion for Orders (A) Approving
25 Sale Procedures, (B) Approving Retention of the Broker, (C) Setting a Sale Hearing Date, and (D)
26 Approving the Sale of the Debtor's Assets (the "*Sale Motion*," and collectively with the Claim
27 Motion, the "*Motions*") were filed on January 7, 2014. The Claim Motion requests that the Court
28 supplement the Lender's unsecured claim by adding \$279,752.01 in reasonable fees, costs, and

1 charges to the Lender's unsecured claim previously ordered and reserving the Lender's right to
 2 supplement the Claim Motion at a later date for amounts incurred after November 31, 2013. The
 3 Sale Motion requests that this Court approve sale procedures for the sale of the Debtor's assets
 4 pursuant to the First Amended Plan of Liquidation for Debtor Horizon Ridge Medical & Corporate
 5 Center, LLC, approve the retention of Commerce Real Estate Solutions as broker for the sale of the
 6 assets, set a sale hearing date, and approve the sale of the Debtor's assets.

7 PLEASE TAKE FURTHER NOTICE that the Motions will be heard by a United States
 8 Bankruptcy Court Judge in the Foley Federal Building, 300 Las Vegas Blvd. S., Courtroom 4
 9 (Second Floor), Las Vegas, NV 89101 on the **6th day of February, 2014 at 11:00 a.m.** The above
 10 referenced Motions are on file with and available from the Clerk of the United States Bankruptcy
 11 Court for the District of Nevada, Foley Federal Building, 300 Las Vegas Blvd. S., Fourth Floor, Las
 12 Vegas, NV 89101; online via the Bankruptcy Court's website at www.nvb.uscourts.gov (a PACER
 13 account is required); or from the undersigned counsel upon request.

14 PLEASE TAKE FURTHER NOTICE that any opposition to the requested relief must be
 15 filed and served on the movant no later than **January 24, 2014**. Any opposition must set forth all
 16 relevant facts and any relevant legal authority. An opposition must be supported by affidavits or
 17 declarations that conform to the provisions of Local Rule 9014(c).

18 If you object to the relief requested, you *must* file a **WRITTEN** response to this
 19 pleading with the court. You *must* also serve your written response on the person who
 20 sent you this notice.

21 If you do not file a written response with the court, or if you do not serve your written
 22 response on the person who sent you this notice,
 23 then:

- 24 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing.

25 PLEASE TAKE FURTHER NOTICE that any reply to any opposition must be filed and
 26 served no later than **January 31, 2014**.

1 PLEASE TAKE FURTHER NOTICE that this hearing may be continued from time to time
2 without further notice except for the announcement of any adjourned dates and times at the above
3 noticed hearing or any adjournment thereof.

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5 DATED: January 9, 2014

DUANE MORRIS LLP

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7 By: /s/ John Robert Weiss
8 John Robert Weiss

9 Attorneys for Bank of America, N.A., successor by
10 merger to LaSalle Bank National Association, as
11 trustee for the registered holders of GMAC
12 Commercial Mortgage Securities, Inc., Commercial
13 Mortgage Pass-Through Certificates, Series 2003-C1,
14 acting by and through CWC Capital Asset Management
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